

Donald Green

From: Ted Hartman <thartman@blackwellburke.com>
Sent: Tuesday, July 10, 2018 2:46 PM
To: Donald Green
Cc: David Hodges; Gabriel Assaad; Samantha Rodriguez; Ben Hulse
Subject: RE: BH MDL - 18-cv-00460, Kilmer v. 3M Company et al.

Good afternoon, Donald.

The reason that the verification page was marked deficient was because it was executed 1/31/18 – prior to the filing of the Complaint, and more than 5 months before the PFS was served. Because the verification is supposed to be executed at the time the PFS is completed, we consider this verification deficient.

Thank you,
Ted

Ted D. Hartman

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Minneapolis, MN 55415
Direct (612) 343-3234
Fax (612) 343-3205
Licensed to practice in Minnesota, Illinois, and Nebraska.

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From: Donald Green [mailto:dgreen@kennedyhodes.com]
Sent: Tuesday, July 03, 2018 11:16 AM
To: Ted Hartman <thartman@blackwellburke.com>
Cc: David Hodges <dhodges@kennedyhodes.com>; Gabriel Assaad <gassaad@kennedyhodes.com>; Samantha Rodriguez <srodriguez@kennedyhodes.com>; Ben Hulse <BHulse@blackwellburke.com>
Subject: FW: BH MDL - 18-cv-00460, Kilmer v. 3M Company et al.

Ted,

Maybe you can help with this issue.

Please see the email below. Can you confirm whether this deficiency notice was issued in error?

Regards,

Donald C. Green II
Associate Attorney
KENNEDY HODGES, L.L.P.
4409 Montrose Blvd, Ste 200
Houston, TX 77006
(713) 523-0001 (Ext. 106)

(713) 523-1116 (Fax)



From: Donald Green

Sent: Monday, July 02, 2018 9:32 AM

To: Ben Hulse <BHulse@blackwellburke.com>

Cc: David Hodges <dhodges@kennedyhodges.com>; Gabriel Assaad <gassaad@kennedyhodges.com>; Samantha Rodriguez <srodriguez@kennedyhodges.com>; Ted Hartman <thartman@blackwellburke.com>

Subject: BH MDL - 18-cv-00460, Kilmer v. 3M Company et al.

Ben,

We had received a deficiency notice for this case back in June. The only deficiency identified in the notice was an issue with the verification. A copy of the deficiency notice is attached, for your reference.

We believe that this deficiency notice was issued erroneously, as a signed verification was uploaded at the time the PFS was created in Blade, along with the authorizations and all other documents. We do not see any other issue with the verification itself. As such, we respectfully request that it be withdrawn.

Please confirm that the deficiency will be withdrawn promptly.

Regards,

Donald C. Green II
Associate Attorney
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4409 Montrose Blvd, Ste 200
Houston, TX 77006
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